Remarks:

1. Rejections.

Claim 2 stands rejected under 35 U.S.C. § 112, ¶ 2, as allegedly failing to particularly point out and to distinctly claim the subject matter which applicant regards as the invention. Claims 1 and 3-6 also stand rejected under 35 U.S.C. § 103(a), as allegedly rendered obvious by U.S. Patent No. 5,506,922 to Grois et al. ("Grois") in view of Japanese Patent No. JP 2002/243978 ("JP'978"), and claim 7 stands rejected under 35 U.S.C. § 103(a), as allegedly rendered obvious by Grois in view of JP'978, as applied to claim 1, and further in view of Patent No. US 6,352,375 B1 to Shimoji et al. Applicants respectfully traverses.

2. <u>Indefiniteness Rejections</u>.

Claim 2 stands rejected as allegedly failing to particularly point out and distinctly claim the subject matter which applicant regards as the invention. In particular, "the other optical connector" allegedly lacks antecedent basis in claim 1. Applicants are amending claims 1 and 2 and respectfully traverse the indefiniteness rejection of claims 1 and 2.

3. Obviousness Rejection.

As noted above, claims 1 and 3-6 also stand rejected as allegedly rendered obvious by Grois in view of JP'978, claim 7 stands rejected as allegedly rendered obvious by Grois in view of JP'978, as applied to claim 1, and further in view of Shimoji. In order to establish a <u>prima facie</u> case for obviousness, the Office Action must fulfill three (3) criteria. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to those of ordinary skill in the art, to modify the primary reference as proposed by the Office Action. Second, there must be a reasonable expectation of success. Third, the prior art references must disclose or suggest all the claim limitations. MPEP 2143. In view of the foregoing amendments and the following remarks, Applicants maintain that the Office Action fails to establish a <u>prima facie</u> case of obviousness with respect to claims 1 and 3-7.

Referring to amended claim 1, a blocking component is disposed and extends within an opening of a housing for coupling another optical connector and has a shutter plate pivotably supported by the housing and an elastic portion separated from the shutter plate and

DC01:402419.1 -5-

mounted on the housing. In addition, the shutter plate includes an opening in which the elastic portion is disposed. The elastic portion normally biases the shutter plate to a closed position at which the shutter plate blocks or shades an optical axis. When another optical connector is inserted into the opening of the housing, the shutter plate is moved by the other optical connector from the closed position to an open position at which the shutter plate does not blocks or shades the optical axis. The blocking component is disposed in the opening of the housing so as to be opened by the other optical connector and is configured, such that the shutter plate and the elastic portion are made separately.

Grois discloses a fiber optic component assembly with a movable protective shield. However, the shield disclosed by Grois is not disposed, nor does it extend, within the coupling portion. Grois provides that "[i]n the closed position, the shield extends generally perpendicularly across or traverses optic axis 64, and the shield projects beyond adapter half 44 to define a lip 70a for grasping by an operator to pivot the shield to its open position and to allow connector 14 to be inserted into receptacle 48 of the adapter." Grois, Column 3, Lines 36-41 (emphasis added). Grois explains that the purpose of this configuration is to "[protect] the inside of the connector assembly from dust, dirt or other hazards." Id. at Lines 41-44. Thus, Grois's first connector is configured to receive Grois's second connector when the end shield has been placed in the open position by an operator. See Grois, Column 2, Lines 24-27. Further, the shield disclosed by Grois is not configured, such that the shutter plate pivoting between a position blocking the optical axis and a position to which the shutter plate is moved by the another optical connector when the another optical connector is inserted into the optical connector. Therefore, amended claim 1 describes a structure distinguishable over Grois.

JP'978 is described in the specification. As described in the Appl'n, Page 3, Line 1-7, the connector of JP'978 has a disadvantage that "to permit scaling up of the blocking component as a result of the increased number of optical fiber cores, the resilience is required to increase. The increase in the resilience of the elastic member result in increase insertion force of the plug, which is not suitable for an optical connector for multi cores." On the contrary, the present invention does not have such disadvantages because the shutter plate and the elastic portion are made separately. Therefore, amended claim 1 describes a structure distinguishable over Grois in view of JP'978.

In addition, as noted above, Grois is configured with shield and lip 70a to seal receptacle 48 until an operator grasps and opens receptacle 48 and to prevent "dust, dirt and

DC01:402419.1 -6-

other hazards." Modification of Grois's shield to remove lip 70a would prevent Grois's shield from extending beyond adapter half 44 and would make Grois's shield unsatisfactory for its intended purpose. Therefore, the Office Action has shown no motivation or suggestion to modify Grois in view of JP'978. MPEP 2143.01 (pg 2100-131-132) (8th ed, Rev. 2 2004).

Accordingly, the invention described in amended claim 1 is not disclosed or suggested by Grois in view of JP'978. Therefore, Applicants respectfully request that the Examiner withdraw the obviousness rejections to claim 1 and 3-7

Conclusion:

Applicants respectfully submit that this application, as amended, is in condition for allowance, and such disposition is earnestly solicited. If the Examiner believes that an interview with Applicants' representatives, either in person or by telephone, would expedite prosecution of this application, Applicants would welcome such an opportunity. Applicant believes that no fees are due as a result of the amendments to the pending claims. Nevertheless, in the event of any variance between the fees determined by Applicants and the fees determined by the PTO, please charge or credit such variance to the undersigned's

Respectfully submitted BAKER BODES, L.L.

Registration No. 33,470

James B. Arnin

Deposit Account No. 02-0375.

Dated: November 15, 2004

Baker Botts, L.L.P. The Warner - Suite 1300 1299 Pennsylvania Avenue, N.W. Washington, D.C. 20004-2400

Tel: (202) 639-7700 Fax: (202) 639-7890

JBA/dw

Enclosures

-7-